IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

IN RE RIO PIEDRAS EXPLOSION LITIGATION

CONSOLIDATED
CIVIL NO. 96-2443 (RJW)

Civil Nos.:

Applies to All Individual Case Numbers and Plaintiffs Listed on Attachments B-1, C-1, and B-1

RECEIVED & FILED DEC 0 3 2002 OFFICE-CLERK U.S. DIST. CT. SAN JUAN, PR

ORDER AND JUDGMENT

Pursuant to the authorization set forth in the constituted United States Bankruptcy Court for the Southern District of New York dated April 11, 2002, and October 10, 2002, annexed hereto as Attachment "A", settlements having been negotiated and accepted through November 11, 2002 on behalf of all plaintiffs listed on Attachments "B-1" and "C-1", and it being the intention and understanding of the Court that this Order and Judgment resolves all claims pending before the Court in the captioned consolidated action, it is

ORDERED AND ADJUDGED that, unless previously submitted to defendants, counsel for each plaintiff listed on Attachment "B-1" shall, within five (5) business days hereof, complete and submit to defendants a copy of the Private Settlement Release

Information Form, annexed hereto as Attachment "E-1", and defendants shall, in turn, furnish to plaintiff's counsel, no later than five (5) business days after receipt of the completed form, the stipulated release and certificate of counsel, which shall be executed and returned to defendants on or before December 20, 2002, and the defendants shall forthwith deposit the settlement payments in the Banco Santander escrow account previously opened by plaintiffs for the receipt and subsequent distribution of private settlement payments; and it is further

ORDERED AND ADJUDGED that, upon deposit of the agreed settlements in the Banco Santander escrow account, the claims in the cases listed on Attachment "B-1", settled privately between plaintiffs and defendants, including the claims of infants and incompetents, which the Court and defendants are advised have been judicially approved by the Court of First Instance of the Commonwealth of Puerto Rico, San Juan Superior Division (Master File No. KDP 96-1808) (hereinafter "Commonwealth Court"), are dismissed with prejudice and without costs; and it is further

on Attachment "B-1" have claims pending before this Court arising from the Río Piedras explosion other than as shown on the Attachment, it is the intention of the parties that such claims

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Order and Judgment Civil No. 96-2443 (RJW) Page 3

are included in the private settlements and are hereby dismissed with prejudice and without costs; and it is further

ORDERED AND ADJUDGED that all of the claims in the cases pending in this Court, listed on Attachment "C-1", and in the cases covered by the parallel judgment of the Commonwealth Court, including the claims of infants and incompetents, which the Court and defendants are advised have been judicially approved by the Commonwealth Court, are settled between plaintiffs and defendants in the aggregate amount of Twenty-Eight Million U.S. Dollars (\$28,000,000.00) (hereinafter "the Global Settlement"); and it is further

ORDERED AND ADJUDGED that, within ten (10) days of the date of this Order and Judgment or the parallel judgment of the Commonwealth Court, whichever is later, defendants shall cause the settlement payment of Twenty-Eight Million U.S. Dollars (\$28,000,000.00) to be deposited in a separate interest-bearing account at Banco Santander Puerto Rico which plaintiffs' counsel are hereby directed to open as the "Global Settlement Account"; and upon deposit of the aforesaid sum in Banco Santander Puerto Rico, all cases listed on Attachment "C-1" are dismissed with prejudice and without costs; and it is further

ORDERED AND ADJUDGED that, unless previously submitted to defendants, counsel for each plaintiff listed on Attachment "C-1"

shall, within twenty (20) days of the date of this Order and Judgment, complete and submit to defendants a copy of the Global Settlement Release Information Form, annexed hereto as Attachment "E-2", and defendants shall, in turn, furnish to plaintiffs' counsel, no later than twenty (20) days after receipt of the completed form, the stipulated release and certificate of counsel, which shall be executed and returned to defendants on or before January 15, 2003, and the defendants shall then forthwith submit all necessary information to the Banco Santander Escrow Agent for an immediate distribution from the Global Settlement Account; and it is further

on Attachment "C-1" have claims pending before this Court arising from the Río Piedras explosion other than as shown on the Attachment, such claims are deemed to be included in the Global Settlement and are hereby dismissed with prejudice and without costs; and it is further

ORDERED AND ADJUDGED that any plaintiff listed on Attachment "B-1," who fails or refuses to submit to defendants an executed release and certificate of counsel, along with copies of judicial authorizations and heirship, if applicable, on or before December 20, 2002, shall be deemed to be in contempt of this Order and Judgment and shall forfeit the agreed settlement amount; and any

plaintiff listed on Attachment "C-1," who fails or refuses to submit to defendants an executed release and certificate of counsel, along with copies of judicial authorizations and heirship, if applicable, on or before January 15, 2003, shall be deemed to be in contempt of this Order and Judgment and shall forfeit the agreed settlement amount, and the Court may reallocate any forfeited Global Settlement amounts in such portions to compliant plaintiffs listed on Attachment "C-1" as it deems appropriate; and it is further

ORDERED AND ADJUDGED that the claims of all plaintiffs in the referenced actions listed on Attachment "D-1" or any other plaintiff with a claim pending before this Court in the captioned consolidated action are dismissed with prejudice on the grounds that such plaintiffs have either settled their claims or such claims have been dismissed with prejudice by a court of competent jurisdiction prior to the date of this Order and Judgment, or have failed to prosecute their claims diligently, or have died and their heirs have not prosecuted the claims, or have otherwise abandoned their claims before this Court; and it is further

ORDERED AND ADJUDGED that any attorney representing a plaintiff in the captioned consolidated action, who has cause to believe that such plaintiff's claim should not be dismissed with prejudice, shall move by order to show cause why the claim of

such plaintiff should not be dismissed with prejudice. Any such motion shall be filed at the Clemente Ruiz Nazario Courthouse, 150 Carlos Chardon Street, Hato Rey, Puerto Rico, and a courtesy copy sent by fax to Honorable Robert J. Ward, fax (212)805-6151, within five (5) business days of the date of this Order and Judgment after having been served by fax upon Attorney Steven C. Lausell, fax (787)751-4068, and Attorney Charles E. Cheek, fax (713)853-6576. Unless a temporary restraining order is granted, all of the provisions of this Order and Judgment shall remain in full force and effect; and it is further

ORDERED AND ADJUDGED that this Order and Judgment is intended and shall be interpreted as dismissing with prejudice and without costs each and every claim pending before the Court in the captioned consolidated action, whether or not specifically identified herein; and the Clerk is directed to make the following docket entry in each of the Civil Actions listed on Attachments "B-1", "C-1", and "D-1": "All claims pending in this action were dismissed with prejudice and without costs by the Order and Judgment dated December 3, 2002"; and it is further

ORDERED AND ADJUDGED that this Court shall retain jurisdiction, up to and including December 20, 2002, to determine any issue relating to this Order and Judgment concerning defendants, and up to and including February 14, 2003, solely to

determine the disposition of any undistributed balance in the Global Settlement Account.

At San Juan, Puerto Rico, this 3rd day of December, 2002.

OBERT J. WAR

United States **N**istrict Judge

Attachment "A"

UNITED	STA	ATES	BANI	(RU	PTCY	COURT	ľ
SOUTHE	RN	DIST	RICT	OF I	NEW	YORK	

		— х	
In re		:	Chapter 11 Case No.
ENRON CORP., et al.,		:	01-16034(AJG)
	Debtors.	: :	(Jointly Administered)
		:	
		x	

STIPULATION AND ORDER (A) AMENDING AGREED ORDER OF APRIL 11, 2002, EXTENDING PARTIAL RELIEF FROM STAY RELATED TO THE RIO PIEDRAS EXPLOSION LITIGATION AND (B) EXTENDING TIME FOR RIO PIEDRAS EXPLOSION LITIGATION PLAINTIFFS TO FILE PROOFS OF CLAIM

A. AMENDING AGREED ORDER EXTENDING OF PARTIAL RELIEF FROM STAY

WHEREAS by Motion for Relief from Stay filed December 27, 2001, (the "Motion"), Moyants sought a partial lifting of the automatic stay in the Rio Piedras Explosion Litigation ("Litigation"), which Litigation refers to over 500 individual cases filed on behalf of over 1.500 separate plaintiffs in the United States District Court for the District of Puerto Rico (Master File No. 96-2443) and the Court of First Instance of the Commonwealth of Puerto Rico. San Juan Superior Division (Master File No. KDP96-1808)) (hereinafter jointly 'Trial Courts"), generally alleging personal injuries (directly and derivatively), business interruption, or property damage as a result of a November 21, 1996 explosion at the Humberto Vidal Building in the Rio Piedras District of San Juan, Puerto Rico. Enron Corp., Enron Engineering & Construction Company, and San Juan Gas Company, Inc., debtors and debtors in possession herein (hereinafter jointly "Debtor Defendants"); Enron Operations Corp., Enron Americas, Inc., and Enron Liquid Services Corp. (hereinafter collectively "Non-Debtor Defendants"), wholly owned affiliates of the Debtor Defendants; and, Puerto Rico Aqueduct and Sewer Authority, Puerto Rico Telephone Company, Humberto Vidal, Inc., and

Heath Consultants Incorporated (hereinafter collectively "Third Party Defendants") are defendants in the Litigation. All defendants and plaintiffs in the Litigation reached confidential arrangements, subsequently approved by the Trial Courts, by which the issues of cause and responsibility for the explosion would not be litigated; instead, all defendants, without any admission of liability and with reservation of defenses, agreed to proceed to the damages phase. The applicable insurance carriers for the Debtor Defendants and the Non-Debtor Defendants, who share the same insurance coverage, as well as insurance carriers for the Third Party Defendants, approved these arrangements. Since then and as of April 11, 2002, over 725 separate plaintiffs' claims had been settled, satisfied, and dismissed, with prejudice, with insurance carriers for the Debtor Defendants and the Non-Debtor Defendants and the Third Party Defendants reimbursing the Debtor Defendants and the Non-Debtor Defendants for settlement payments and related fees, costs, and expenses incurred by the Debtor Defendants and the Non-Debtor Defendants in settling these claims. Other plaintiffs' claims had then been dismissed voluntarily or by court order. As of April 11, 2002, nearly 750 separate plaintiffs' claims, however, remained unliquidated and pending before the Trial Courts (hereinafter "Pending Actions").

WHEREAS, on April 11, 2002, the Court entered an Agreed Order authorizing the Non-Debtor Defendants through September 30, 2002, to proceed with settling Pending Actions on behalf of all defendants, subject to an overall cap of \$50 million (the "Overall Cap") inclusive of costs and fees, among other limitations, and otherwise denied the Motion ("April 11 Order"). Following entry of the April 11 Order, the claims of 321 plaintiffs (exclusive of conjugal plaintiffs) have been privately settled for nearly \$7.8 million. When added to the settlements reached before the Enron Bankruptcy, the claims of 1066 plaintiffs

(exclusive of conjugal plaintiffs) are now settled. Of those plaintiffs, all have entered the agreed releases, moved for the dismissal with prejudice of their claims, and the settlement amounts have been paid to their escrow agent EXCEPT for 171 plaintiffs for whom the submission of release information or the return of executed releases is pending. On July 16, 2002 a global settlement of \$28 million to resolve all remaining plaintiffs' claims, federal and local, was reached among representative counsel for the plaintiffs, Non-Debtor Defendants' carriers' counsel, and Non-Debtor Defendants' counsel under the auspices of Hon. Robert J. Ward Senior District Judge for the Southern District New York, but sitting by designation as the presiding judge for the federal Rio Piedras Litigation, with the Commonwealth Court Judge having authorized Judge Ward to mediate a global settlement for the local court claims. Both Trial Court judges have endorsed the settlement. Should this global settlement be consummated, the claims of over 400 plaintiffs, including individuals and business entities, will be fully and finally settled and the Litigation will be fully and finally resolved. Debtor Defendants, Non-Debtors Defendants, and plaintiffs hereby stipulate that additional time is needed to consummate this global settlement and the pending individual settlements. It is in the best interest of the Debtor Defendants' estates if these settlements can be consummated and the Rio Piedras Explosion Litigation fully and finally resolved.

WHEREAS it appearing that the Court has jurisdiction to consider the Motion, that due notice of the Motion has been given, that no further notice need be given, and upon the proceedings before the Court and good and sufficient cause appearing;

IT IS HEREBY ORDERED THAT:

The April 11 Order is amended to authorize the Non-Debtor Defendants, the
 Third Party Defendants, and the plaintiffs in the Pending Actions, through November 11,

2002, and without need of further authorization from the Court pursuant to Bankruptcy Rule 9019 or otherwise, to negotiate and accept settlements of Pending Actions.

The April 11 Order authorized the Trial Courts to take all action in their 2. discretion and consistent with this Order to promote, expedite, and confirm the settlement of Pending Actions, including, without limitation, judicial authorization of settlements, as necessary; the entry of orders of dismissal, with prejudice, of settle claims, as appropriate; and, the use of expedited discovery tools, court annexed mediation, independent mediators. and court appointed experts, as found appropriate by either or both Trial Courts. The April 11 Order is further amended to extend this authority of the Trial Courts through December 20. 2002, to cause (a) the submission of executed releases and related settlement documents to the Non-Debtor Defendants; (b) the payment of settlement amounts thereunder, and (c) entry of dismissals, with prejudice, of all plaintiffs' claims settled in principle on or before November 11, 2002.

B. EXTENSION OF BAR DATE

WHEREAS, commencing on December 2, 2001, Enron Corp. and its affiliated debtor entities, as debtors and debtors in possession (collectively, the "Debtors"), filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code") in the United States Bankruptcy Court for the Southern District of New York (the "Court"); and

WHEREAS, on August 1, 2002, the Court in the above-referenced Chapter 11 cases entered an order (the "Bar Date Order") establishing October 15, 2002 as the deadline within which certain creditors of the Debtors must file proofs of claim; and

WHEREAS, pursuant to the Bar Date Order, any Debtor may extend its bar date for any particular creditor upon filing with the Court a stipulation setting forth such extension, subject to notice and a hearing.

WHEREAS, the Rio Piedras Explosion Litigation Plaintiffs and certain of the Non-Debtors are negotiating settlements that would, among other things, settle and resolve all claims relating to such litigation; and

WHEREAS, the aforementioned settlements were consummated, none of the Rio Piedras Explosion Litigation Plaintiffs would need to file a proof of claim with respect to claims settled and resolved under such settlement: and

WHEREAS, the aforementioned settlement may not be effected, if at all, prior to the bar date: and

WHEREAS, in light of the foregoing, the Debtors desire to extend the deadline within which the Rio Piedras Explosion Litigation Plaintiffs may file proofs of claim against the Debtors to and including November 11, 2002; and

WHEREAS, there will be no prejudice to the Debtors' estates if the deadline for the Rio Piedras Explosion Litigation Plaintiffs to file proofs of claim is extended to and including November 11, 2002.

NOW, THEREFORE, it is hereby stipulated and agreed among the Debtors and the Rio Piedras Explosion Litigation Plaintiffs as follows:

The time for the Rio Piedras Explosion Litigation Plaintiffs to file proofs of claim against any and all estates of the Debtors is hereby extended to and including November 11, 2002.

- Except as provided herein, the parties reserve all of their respective rights, 2. claims and defenses.
- To facilitate execution, this Stipulation and Order may be executed in as many 3. counterparts as may be convenient or required. It shall not be necessary that the signature and acknowledgement of, or on behalf of, each party, or that the signature and acknowledgment of all persons required to bind any party, appear on each counterpart. All counterparts shall collectively constitute a single instrument. It shall not be necessary in making proof of this Stipulation and Order to produce or account for more than a single counterpart containing the respective signatures and acknowledgement of, or on behalf of, each of the parties hereto. Facsimile signatures shall be binding to the same effect as originals.

Dated: New York, New York October 9, 2002

/s/ Brian Rosen
Martin J. Bienenstock (MB 3001)
Brian S. Rosen (BR 0571)
Melanie Gray
Martin Sosland
WEIL, GOTSHAL & MANGES LLP

767 Fifth Avenue New York, New York 10153 Telephone: (212) 310-8000

Fax: (212) 310-8007

Attorneys for Debtors and Debtors in Possession

- and -

Golub & Golub, LLP Attorneys for Rio Piedras Explosion Litigation Plaintiffs

By: /s/ Steven M. Golub
Steven M. Golub (sg-3592)
A Member of the Firm
225 Broadway, 15th Floor
New York, New York 10007
Telephone: (212) 693-1000

SO ORDERED:

New York, New York October 10, 2002

> s/Arthur J. Gonzalez UNITED STATES BANKRUPTCY JUDGE

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re

Chapter 11

ENRON CORP., et al.,

Case No. 01-16034 (AJG)

Jointly Administered

Debtors.

AGREED ORDER WITH RESPECT TO MOTION FOR PARTIAL RELIEF FROM STAY RELATED TO THE RIO PIEDRAS EXPLOSION LITIGATION

By Motion for Relief from Stay filed December 27, 2001, (the "Motion"), Movants sought a partial lifting of the automatic stay in the Rio Piedras Explosion Litigation ("Litigation"), which Litigation refers to over 500 individual cases filed on behalf of over 1,500 separate plaintiffs in the United States District Court for the District of Puerto Rico (Master File No. 96-2443) and the Court of First Instance of the Commonwealth of Puerto Rico, San Juan Superior Division (Master File No. KDP96-1808 (801)) (hereinafter jointly "Trial Courts"), generally alleging personal injuries (directly and derivatively), business interruption, or property damage as a result of a November 21, 1996 explosion at the Humberto Vidal Building in the Rio Piedras District of San Juan, Puerto Rico. Enron Corp. and Enron Engineering & Construction Company, debtors and debtors in possession herein (hereinafter jointly "Debtors"); San Juan Gas Company, Inc., Enron Operations Corp., and Enron Liquid Services Corp. (hereinafter collectively "San Juan Gas Defendants"), wholly owned affiliates of the Debtors; and, Puerto Rico Aqueduct and Sewer Authority, Puerto Rico Telephone Company, Humberto Vidal, Inc., and Heath Consultants Incorporated (hereinafter collectively "Third Party Defendants") are

defendants in the Litigation. All defendants and plaintiffs in the Litigation reached confidential arrangements, subsequently approved by the Trial Courts, by which the issues of cause and responsibility for the explosion would not be litigated; instead, all defendants, without any admission of liability and with reservation of defenses, agreed to proceed to the damages phase. The applicable insurance carriers for the Debtors and the San Juan Gas Defendants, who share the same insurance coverage, as well as insurance carriers for the Third Party Defendants, approved these arrangements. Since then, over 725 separate plaintiffs' claims have been settled, satisfied, and dismissed, with prejudice, with insurance carriers for the Debtors and the San Juan Gas Defendants and the Third Party Defendants reimbursing the Debtors and the San Juan Gas Defendants for settlement payments and related fees, costs, and expenses incurred by the Debtors and the San Juan Gas Defendants in settling these claims. Other plaintiffs' claims have been dismissed voluntarily or by court order. Nearly 750 separate plaintiffs' claims, however, remain untiquidated and pending before the Trial Courts (hereinafter "Pending Actions").

It appearing that the Court has jurisdiction to consider the Motion, that due notice of the Motion has been given, that no further notice need be given, and upon the proceedings before the Court and good and sufficient cause appearing;

IT IS HEREBY ORDERED THAT:

1. The San Juan Gas Defendants, the Third Party Defendants, and the plaintiffs in the Pending Actions are hereby authorized, through September 30, 2002, and without need of further authorization from the Court pursuant to Bankruptcy Rule 9019 or otherwise, to negotiate, accept, document, and satisfy settlements of Pending Actions in line with the practices and values already established in the Litigation, but subject to a total cap of \$50 million covering all settlement amounts and related fees, costs, and expenses incurred and paid by the San Juan

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Gas Defendants in settling Pending Actions; provided, however, the Debtors are dismissed, with

prejudice, and fully released from each such settled Pending Action.

The San Juan Gas Defendants shall promptly request reimbursement of settlement 2.

payments and related fees, costs, and expenses from their insurance carriers.

The Trial Courts are hereby authorized to take all action in their discretion and 3.

consistent with this Order to promote, expedite, and confirm the settlement of Pending Actions,

including, without limitation, judicial authorization of settlements, as necessary: the entry of

orders of dismissal, with prejudice, of settled claims, as appropriate; and, the use of expedited

discovery tools, court annexed mediation, independent mediators, and court appointed experts. as

found appropriate by either or both Trial Courts.

The Motion is denied, without prejudice. If any Pending Actions have not been 4.

settled and dismissed, with prejudice, on October 1, 2002, plaintiffs in such remaining Pending

Actions may seek further relief from the Court. Pending such further relief being granted the

automatic stay remains in effect for all purposes and the trial of any Pending Actions, as against

the Debtors or the San Juan Gas Defendants, or any proceeding to enforce any obligation of the

Debtors or the San Juan Gas Defendants incident to or arising out of the Litigation remains

stayed until further order of the Court.

Dated: New York, New York

April 11, 2002

s/Arthur J. Gonzalez

HONORABLE ARTHUR J. GONZALEZ

UNITED STATES BANKRUPTCY JUDGE

Attachment B-1

RIO PIEDRAS EXPLOSION LITIGATION PRIVATE SETTLEMENTS WITH PLAINTIFFS IN FEDERAL COURT

Civil No. 97-2721

Attorney: Guillemard Noble, Andrés Plaintiff: Cuevas Fermín, Jennifer Cuevas Fermín, Kelvia A.

> Cuevas Fermín Guzmán, Ruth Ester Fermín Espinal, Carmen Luisa

Civil No. 97-1123 Attorney: Agosto, Benny

Plaintiff: Castro Febres, Omar José

Castro Canales, Carmen a/k/a/ Febres

Canales, Carmen

Castro Febres, Angel Rafael Castro Febres, Awilda Castro Febres, Carmen Luisa Castro Febres, Coralis Ivette Castro Román, José Angel Castro Febres, José Enrique

Febres, María

Valentín Castro, Jonathan Velázquez Castro, Joseph

Castro Febres, José Angel

Civil No. 96-2561

Attorney: Quetglas Jordan, Eric M. Plaintiff: Santiago Hernández, Yolanda

Santiago Martínez, Justino Hernández Pagán, Virginia Cruz Santiago, Juan Antonio Cruz Santiago, Christian Joel

Civil No. 97-1187

Attorney: Ortiz San Miguel, María del Mar

Plaintiff: Rivera Rivera, José M. Rivera Torres, Teresa

Civil No. 97-1207

Attorney: Ortiz San Miguel, María del Mar

Plaintiff: Vázquez Nieves, Eddie Del Valle Ramos, Emily

Civil No. 97-2669

Attorney: Rochet Santoro, Nelson Plaintiff: Aponte Martínez, Miguel

> Cabrera Martínez, Haydeé Zaymara González Meléndez, José Luis

González Rivera, Plácido Jiménez Arocho, Arcadio

Morales, Juan Reves, Gisela

Díaz Peralta, Rolando Alberto

Civil No. 97-1109

Attorney: Satz-Hanley, Peter

Plaintiff: de la Cruz García, Zenia A. Hilario Mojica, Luis Guillermo

Civil No. 97-2710

Attorney: Satz-Hanley, Peter

Plaintiff: Padilla Brenes, Francisco

Vázquez Vega, María de los

Angeles Vega, Judith Civil No. 97-2711

Attorney: Satz-Hanley, Peter

Plaintiff: Jaime Gómez, Lidia a/k/a Rosario

Gómez, Lidia Gómez, Luz

Jaime Dyke, Amaro Eduardo Jaime Gómez, Amaro Eduardo

Rosario Pomales, Juan Maldonado, Wanda

Civil No. 97-2712

Attorney: Satz-Hanley, Peter

Plaintiff: Guzmán Portillo, Ernestina

Ureña Brito, Celeste Alicia

Reyes Soto, Alice López, Santos

Betancourt, Cándido Rodríguez, Raúl Reyna, Enrique

Rodriguez, Roberto Tejera, Wilfredo T. Vargas, Antonio

Silvestre, Luciano

Rivera, Jorge Díaz, Luz

Rodríguez del Valle, Emilio

Ortiz Polonia, Ana Acevedo Lugo, Pedro Andújar, Miguel

Arbelo Medina, Rafael Germán Brito, Regina Burgos, Myriam

Colón Mercedes, Víctor F. Correa Castro, Valentina

Cotto Casellas, Otilia Cotto Casellas, Sarah

de la Rosa de León, Crucita Díaz Mercado, Carmelo

Díaz Díaz, Catalino Fontanez, Víctor Gómez, Elido

González Monte, Jennifer

González, Félix

Guadalupe Betancourt, Adrián Guzmán Escribano, Ruperto

Jiménez, Ramón Carlo, Angel Luis Maldonado, Félix

Montalbán Alemán, Norberto

Díaz, José Manuel Martínez, Cristina Massoinet, Jaime Medero, Oscar

Mojica O'Farrill, Carmelo Mojica Rosario, Iris Melania

Montes Tirado, Zaida Ortiz Sepúlveda, José Ortiz Sepúlveda, Luis

Ortiz, William

Oscana Martínez, Felícita

Pagán, Minesio Pimentel, Danilo Quezada, Ulises Resto Mulero, Edwin Rivera Hiraldo, Rafael A. Rodríguez Reyes, Rigoberto Rondón Moreno, Gaspar Ruiz Velázquez, Elias Sánchez, Manuel Santana, José R. Santiago, Marta

Troche, Carmen Migdalia

Sosa, Raúl

Ulloa, María Elena Cortés, Francisco García Burgos, Eulojia Guzmán, Maria Clotilde Guzmán, Ramona del Carmen Hernández Guzmán, José Alexis

Hernández Guzmán, Alejandro

Guzmán García, Francisco

Civil No. 97-1167

Attorney: Satz-Hanley, Peter

Plaintiff: Hernández Acosta, Ramón

Hernández Acosta, Teodoro

Civil No. 97-2713

Attorney: Satz-Hanley, Peter

Plaintiff: Aponte Delgado, Gladys

Rivera Aponte, Ivonne

Civil No. 97-2687

Attorney: Lausell, Steven C.

Plaintiff: Noel High, James D.

Pou Morales, Josefina Fátima

Civil No. 02-1839

Attorney: Satz-Hanley, Peter

Plaintiff: Ramos Santiago, María Theresa

Attachment C-1

RIO PIEDRAS EXPLOSION LITIGATION GLOBAL SETTLEMENT WITH PLAINTIFFS IN FEDERAL COURT

Civil No. 97-2320 Attorney: Barrios, Renato Plaintiff: Ríos Salgado, Luis

Civil No. 97-2680 Attorney: Barrios, Renato

Plaintiff: Sánchez Marte, Manuel de Jesús

97-2616 Civil No. Attorney: Bruno, Francisco

Plaintiff: del Moral Dolagaray, José Damián

del Moral Dolagaray, Roberto Iguina Dolagaray, Carmen Luisa

Iguina Dolagaray, Diana Iguina Dolagaray, Gabriel Iguina Dolagaray, Julio

Civil No. 97-1200 Attorney: Bruno, Francisco Plaintiff: Joyería Super Precio

Civil No. 97-2598 Attorney: Bruno, Francisco

Plaintiff: Rodríguez Reynoso, Josefina

Altagracia

Rodríguez Rodríguez, Diana Santana Castro, Rafael

Civil No. 97-1357 Attorney: Bruno, Francisco Plaintiff: Tiendas Madison

Civil No. 97-1297 Attorney: Bruno, Francisco Plaintiff: Rivera Nieves, William

Dávila Román, Concepción González Irizarry, José R. González Rivera, Ana Cristina González Rivera, Elena Sofia

Rivera Dávila, Maribel Rivera Dávila, William

Yagnich Figueroa, Vanessa María

97-2734 Civil No. Attorney: Bruno, Francisco

Plaintiff: Cosme Pérez, Carlos Miguel

Pérez Mojica, Aida Luz

Civil No. 97-2597 Attorney: Bruno, Francisco Plaintiff: Hurtado Gómez, Gloria

Castillo Hurtado, Ana Gloria

Civil No. 97-1449 Attorney: Bruno, Francisco

Plaintiff: Marroni Luengo, Luis Alberto

Ortiz Pérez, Evelyn

Civil No. 97-2663

Attorney: Escanellas Rivera, Aníbal Plaintiff: Rivera Rosado, Sandro

Infante, Jesús

Menéndez, Orlando

Rivera Ramos, Angel Tomás Rivera Rosado, Angel Tomás

Rivera Rosado, Dialis Rivera Rosado, Eneida Rivera Rosado, Gladys Rivera Rosado, Hilda Rivera Rosado, Marisol Rivera Rosado, Ruth

Rosado Muñiz, Emerenciana

Santana, Steven Soto, David Soto, Eduardo

Civil No. 97-2718

Attorney: Guillemard, Andrés

Plaintiff: Antilles Insurance Company

Civil No. 97-2586

Attorney: Guillemard, Andrés

Plaintiff: Dollar Stores, Inc. a/k/a Dollar

Express

Pi-Fors de Soberón, Graciela Soberón Quintana, Rolando

Civil No. 97-1578

Attorney: Guillemard, Andrés

Plaintiff: González Suárez, José Luis

Mier Romeo, Nicole M.

P.G. Enterprises, Inc. d/b/a Pepe

Ganga

Civil No. 97-2585

Attorney: Guillemard, Andrés

Plaintiff: Hita Guzmán, Janet

Mesa Arcoba, Juan A. Mesa Villar, Alfredo

Jenny de Río Piedras, Inc.

La Feria de Río Piedras, Inc.

Civil No. 97-2721

Attorney: Guillemard, Andrés

Plaintiff: Reyes Ramirez, Manuel

Santos Sierra, Grisselle

Reyes Santos, Katiria

Arroyo Torres, Dayaneris

Feliciano Martínez, David

de Jesús, Dorca E.

Figueroa Figueroa, Alba Iris

Lozada Morales, Marcela

Mesa Colón, Mayra Idalys

Rullán Feliciano, Ana Mercedes

Santiago Rullán, Angel M.

Vizcarrondo, Torres Isidoro

Tapia Colón, Gloria E.

Velázquez Vázquez, Marta

Morales Rivera, Wilfredo

Morales Velázquez, Arelis Morales Velázquez, Gisela Morales Velázquez, Wilfredo López Ponce, Ivonne Waleska López Rodríguez, Delfin

Civil No. 97-2688

Attorney: Hernández, Juan A.

Plaintiff: Caribbean Beauty & Technical

Institute

Medina Rodríguez, Julia Medina Serrano, Feliciano

Civil No. 97-2690

Attorney: Hernández, Juan A.

Plaintiff: Osorio Concepción, Ana Delia

Gutiérrez Pacheco, Porfirio

Civil No. 97-2682

Attorney: Lausell, Steven

Plaintiff: Humberto Vidal, Inc.

Civil No. 97-2328

Attorney: Lausell, Steven

Plaintiff: Vidal Nadal, Juan Ramón

Humberto

Pagán Garcés de Vidal, Annie

Civil No. 97-2433

Attorney: Lausell, Steven

Plaintiff: Vidal Pagán, Pedro Enrique

Torres Ortiz, Evelyn Awilda

Civil No. 97-2540

Attorney: Lausell, Steven

Plaintiff: Vidal Pagán, Juan Ramón

Humberto

Delfillo Nasar, Heidi delCarmen

Civil No. 97-2683
Attorney: Lausell, Steven
Plaintiff: Vidal Pagán, Luis

Liceaga Rodríguez, Sofia de

Lourdes

Civil No. 97-2016 Attorney: Lausell, Steven

Plaintiff: Díaz Rosado, Víctor Javier

Lozada Torres, Eneida

Civil No. 97-2020 Attorney: Lausell, Steven

Plaintiff: Alemán Santos, Eurípides

Civil No. 97-2240 Attorney: Lausell, Steven

Plaintiff: Alonso Vasallo, Francisco Emilio

Galbis Rodríguez, Magali del

Rosario

Civil No. 97-2146 Attorney: Lausell, Steven

Plaintiff: Ramos Ortiz, Juan Manuel Valentín Serrano, Wilma

Civil No. 97-2257 Attorney: Lausell, Steven

Plaintiff: Alejandro Hernández, José Ramón

Civil No. 97-1853 Attorney: Lausell, Steven

Plaintiff: Burgos Rodríguez, Samuel

Marrero Torres, Gloria Esther

Civil No. 97-2015 Attorney: Lausell, Steven

Plaintiff: Cátala Benítez, Ernesto

Civil No. 97-1502 Attorney: Lausell, Steven

Plaintiff: de Jesús Rodríguez, Gilberto

Civil No. 97-1850
Attorney: Lausell, Steven

Plaintiff: Dobles Nieves, María

Hernández Pueriet, Félix Jacinto

Civil No. 97-1151
Attorney: Lausell, Steven
Plaintiff: Félix Rivera, Juanita

Civil No. 97-2685 Attorney: Lausell, Steven

Plaintiff: Meléndez Rodríguez, Ana Judith

Civil No. 97-2684
Attorney: Lausell, Steven

Plaintiff: Fernández Soler, Juan Manuel

Civil No. 97-1851 Attorney: Lausell, Steven

Plaintiff: Maurás García, Nazario

Civil No. 97-1503 Attorney: Lausell, Steven

Plaintiff: Merheb Pagan, Naim Miguel Emanuelli Fernández, María Ely

Civil No. 97-1150 Attorney: Lausell, Steven

Plaintiff: Mundo de León, Gladys de

Lourdes

Civil No. 97-1677 Attorney: Lausell, Steven

Plaintiff: Navarro Hernández, Tomás

Civil No. 97-1504 Attorney: Lausell, Steven

Plaintiff: Pagán Garcés, Rosa María

Civil No. 97-1852 Attorney: Lausell, Steven

Plaintiff: Pérez Negrón, Lourdes Enid

Civil No. 97-2241 Attorney: Lausell, Steven

Plaintiff: Rabelo Millán, Víctor Manuel

Civil No. 97-1956 Attorney: Lausell, Steven

Plaintiff: Rivera Franco, José Alberto

Civil No. 97-1501 Attorney: Lausell, Steven

Plaintiff: Rivera Montañez, Maria de los

Angeles

Rodríguez Padilla, Pedro Efraín

Civil No. 97-2014 Attorney: Lausell, Steven

Plaintiff: Rohena Correa, Pedro

Civil No. 97-1678 Attorney: Lausell, Steven

Plaintiff: Rosario Ayala, Héctor Manuel

Texidor Díaz, Sonia

Civil No. 97-1918 Attorney: Lausell, Steven

Plaintiff: Salcedo Burton, Frank Joseph

Civil No. 97-1849 Attorney: Lausell, Steven

Plaintiff: Sánchez Vélez, Santos Manuel

Civil No. 97-1499 Attorney: Lausell, Steven

Plaintiff: Santos Llanos, Gloria Margarita

Civil No. 97-1193 Attorney: Lausell, Steven

Plaintiff: Torres González, Juan R.

Civil No. 97-1500 Attorney: Lausell, Steven

Plaintiff: Vázquez Bermúdez, José Antonio

Civil No. 97-1676 Attorney: Lausell, Steven

Plaintiff: Vázquez Cruz, Carlos Hiram

Civil No. 97-2686 Attorney: Lausell, Steven Plaintiff: García Castro, Tirso Rivera Rivera, Mayra García Rivera, Brenmarie

Civil No. 97-1854 Attorney: Lausell, Steven

Plaintiff: O'Farrill Quiñones, Carmen María

Torres Ortiz, Félix Antonio Torres O'Farrill, Glenda M.

Civil No. 97-2145 Attorney: Lausell, Steven

Plaintiff: Ríos Alberio, Carmen Maria

Civil No. 97-1152 Attorney: Lausell, Steven

Plaintiff: Rosa Merced, Mery Lynne

Civil No. 97-2770

Attorney: Mudd, John/Esther Leyra Benítez

Plaintiff: Castro Toro, Ramón Cortés Rivera, Carlos A. Agosto Calderón, Augusto

Civil No. 97-1507

Attorney: Ortiz Belaval, Benjamín Plaintiff: Servicios Ligeros Parking, Inc. Velázquez Cruz, Carlos

Civil No. 97-1239

Attorney: Ortiz San Miguel, María del Mar Plaintiff: Inmobiliaria J. P. Cordera, Inc. Almacenes Riviera, Inc.

Civil No. 97-1187

Attorney: Ortiz San Miguel, María del Mar

Plaintiff: La California, Inc.

Civil No. 97-2488

Attorney: Pagán, Víctor J.

Plaintiff: Méndez Ponce, Linda Elena

David Rivera, María Migdalia

David Rivera, Humberto

Civil No. 97-1172

Attorney: Pérez González, Freddie

Plaintiff: Acosta Calderón, José D.

Ubiñas Burgos, Jeanne (Dr.)

Dieppa Barreiro, Tomás

Barreiro Pérez, María L.

Martínez Santiago, Edgardo

Pastrana Nieves, Dorca

Bruno Díaz, Angel Luis

Almenas Díaz, Roberto Arocho Hernández, Miguel

Cabán Pérez, Stepahie a/k/a Cabán

Perez, Estebania

Arocho González, José

Ayala Meléndez, Elizabeth

Sánchez Marrero, José Angel

Bermejo Ubiñas, Samuel

Ballester Pinan, Vanesa

Colón Navarro, Wanda

Navarro Rivera, Wanda I.

Cordero Pérez, Carmen

Rivera Villalobos, Angel

Rivera Cordero, Angel R.

Cortez Ortiz, Rafael Angel

de Jesús Feliciano, Grizzly L.

de Jesus Feliciano, Grysoida a/k/a

de Jesus Feliciano, Grisoida

Liz

Feliciano Vázquez, Leonarda

Díaz Ocasio, Carla Sussette

Ocasio Matos, Susan

Figueroa Adorno, Julie E.

Adorno Diaz, Carmen L.

Gómez Galán, Altagracia

Perdomo Gómez, Alexis Rafael

Perdomo Gómez, Belkys

Perdomo Gómez, Héctor Rafael

Hernández Rivera, Willie

Huertas Claudio, Myriam

Ledes Bruzón, Viviana

Mattei Padilla, Rosangeles

Perdomo Gómez, Amarilis

Meiías Perdomo, Amarilis

Francesca

Mejías González, Francisco

Millán Reyes, Irma

Alicea Sanabria, Javier

Alicea Millán, Javier

Alicea Millán, Juan Javier

Miranda Miranda, Lynell

Nieves Luciano, Daniel

Padilla Robles, Wanda

Ramos, Arnaldo

Robles Hernández, Carmen M.

Rivera Serrata, Cynthia del Pilar

Rivera Rosario, Aníbal

Serrata Espinal, Alba

Rodríguez Galarza, Carmen Laura

Clemente Rodríguez, José R.

Clemente Rodríguez, Rafael

Vargas Goicoechea, Sonia

Rosario Apolinar, Dinorah

Garcia Rosario, Rosangeris

Sánchez Pastrana, José

Pastrana Olmo, Isabel

Santiago Rodríguez, Tomás

Sárraga Maldonado, Ana María

Tejera Paredes, Evangelina

Tejera Paredes, Marcos A.

Veguet, María G.

Vélez Morales, Carmen Ana

Villenueva Ubiñas, José

Civil No. 99-2414

Attorney: Pérez González, Freddie

Plaintiff: Pérez Pérez, Olga Melania

Rivera Tirado, Rubén

Pérez, Rosa

Civil No. 97-2668

Attorney: Rochet Santoro, Nelson Plaintiff: Figuerora Galarza, Evelyn Morales Morales, Genoveva Paulino Gómez, Héctor Ramírez Mojica, Milagros Rosa Chávez, José Miguel Vargas Vázquez, José Miguel Ramírez Valdez, Rafael de Jesús

Borrero, Benigno Acosta Mejías, Ramona

Civil No. 97-2669

Attorney: Rochet Santoro, Nelson Plaintiff: Vargas Vázquez, José Miguel Ramírez Valdez, Rafael de Jesús

Civil No. 97-2770

Attorney: Rochet Santoro, Nelson Plaintiff: Marrero Negrón, Angel

Civil No. 97-2561

Attorney: Román Carrasquillo, Félix / Rafael Santos del Valle / Ojeda Diez, Rafael

Plaintiff: Colón Patrón, Ramón Abilio Roldán Flores, Margarita Bertrán Jiménez, Sonia Colón Patrón, Sergio Federico

Civil No. 97-2769 Attorney: Rosario, Edgardo Moldes, Juan

Plaintiff: El Fénix de Puerto Rico (Insurance Company)

Civil No. 96-2638

Attorney: Saadé Lloréns, Pedro J. Plaintiff: Ayala Ramos, Elisa Mariam

Ramos Rivera, Janet Ramos Rivera, Jorge Rafael Rivera del Moral, Justina

Civil No. 00-1080

Attorney: Saadé Lloréns, Pedro J. Plaintiff: Heredia Rodríguez, Carmen B.

97-2741

Civil No.

Attorney: Saadé Lloréns, Pedro J. Plaintiff: Ramos Bosque, Carlos

Civil No. 97-2761

Attorney: Saadé Lloréns, Pedro J. Plaintiff: Resto Toledo, Esteban a/k/a Toledo, Esteban

Civil No. 99-1196

Attorney: Saadé Lloréns, Pedro J. Plaintiff: Encarnación Rivera, Edgar Rodríguez Elba, Aleida

Civil No. 97-1957

Attorney: Saadé Lloréns, Pedro J. Plaintiff: Muñoz Mejías, Edith Carreras Pérez, Lorenzo Vázquez Olivero, Héctor

Civil No. 97-1806

Attorney: Saadé Lloréns, Pedro J. Plaintiff: Pacheco Rosado, Juan Romero Pacheco, Iris Angélica Romero Pacheco, Elizabeth Romero Pacheco, Israel Moisés

Narváez Delgado, Alicia

Civil No. 97-1038

Attorney: Saadé Loréns, Pedro J. Plaintiff: Picorelli Cruz, Jean Khris Picorelli Osorio, Blas

Civil No. 99-1337

Attorney: Saadé Lloréns, Pedro J. Plaintiff: del Valle Pérez, Rubén

Civil No. 97-2372

Attorney: Saadé Lloréns, Pedro J. Plaintiff: Rosario Díaz, Hilda

Civil No. 98-1572

Attorney: Saadé Lloréns, Pedro J. Plaintiff: López Santiago, María M.

Civil No. 97-2677

Attorney: Thomas Santiago, Víctor C. Plaintiff: Martínez Toribio, Miguelina

Belkys

Vélez Otero, Prentis Radamés

Civil No. 97-1545

Attorney: Ortiz San Miguel, Maria del Mar

Plaintiff: Negrón Falcón, Benigno

Attachment D-1

RIO PIEDRAS EXPLOSION LITIGATION PENDING CLAIMS BEFORE FEDERAL COURT

Civil No. 97-2595

Attorney: Bruno, Francisco

Plaintiff: Villalongo, Genoveva

Civil No. 97-2598

Attorney: Bruno, Francisco Plaintiff: S & R Joyeros, Inc.

Civil No. 97-2770

Attorney: Cesse, Henry

Plaintiff: Rivera Nieves, Jesús

Quiñónez Colón, Carmen D.

Civil No. 97-2669

Attorney: Rochet Santoro, Nelson Plaintiff: Fernández López, Pedro D.

García García, Angel

Guzmán, Sonia Negrón, Carmen J.

Ortiz Polonia, Ana

Resto Toledo, Esteban a/k/a

Toledo, Esteban

Guzmán García, María Josefa Marroni Luengo, Luis Alberto

Civil No. 97-1364

Attorney: Saadé Llorens, Pedro J. Plaintiff: Díaz Torres, Fernando

Civil No. 97-2712

Attorney: Satz-Hanley, Peter J.

Plaintiff: Almonte Rosario, Ana Beatriz

Colón, Gilberto De La Cruz, Manuel Escribano Trinidad, Julio Maldonado, Angel Luis

Ramírez Rosado, Raul

Attachment E-1

GLOBAL SETTLEMENT RELEASE INFORMATION FORM

Pa	rt A: Plaintiff's Information; Federal Case #	#: and/or Local Case #:	
1.	Full Name:	Social Security #:	and the same of th
2.	Street Address:		
	City:		
4.	Telephone Number:		
5.	Country of Residence:C	country of Citizenship:	······································
6.	Is Plaintiff today under the age of twenty-one 6a. If yes, is Resolution for Judicial Authoriza Yes or No (Circle One) 6b. If Resolution is not attached, when was M	ation in Commonwealth Court Attached?	
7.			ge of twenty-one (21)
8.	Is Plaintiff deceased? Yes or No (Circle One) 8a. If yes, Is Declaration of Heirship attached 8b. Please list all heirs:	? Yes or No (Circle One)	
9.		y injuries, mental anguish, pain and suffer	ring and similar claims
10	. Settlement amount for compensation of:		
	a. Loss of income: \$\frac{\\$}{2}\$ c. Property damage: \$\frac{\\$}{2}\$ a. Other Similar Claims: \$\frac{\\$}{2}\$	b. Business interruption: \$ d. Economic Support: \$ explain:	
Pε	art B: Attorney's Information		
1.	Federal Case Number:	2. State Case Number:	
la	. Fed Attorney Name:	2a. St Attorney Name:	
1 b	. Federal Bar Number:	2b. State Bar Number	

Submit completed form to: Ann Hicks by express mail at The Enron Building, 1400 Smith Street, Room 2106A, Houston, Texas 77002 or by facsimile at 713-853-6576.

PRIVATE SETTLEMENT RELEASE INFORMATION FORM

Pa	rt A: Plaintiff's Information; Federal Case #:		and/or Local	Case #:		
1.	Full Name:	Social	Social Security #:			
2.	Street Address:					
3.	City:	State:	Zip Code:			
4.	Telephone Number:	·				
5.	Country of Residence: Cou	untry of Citize	nship:			
6.	Is Plaintiff today under the age of twenty-one (26a. If yes, is Resolution for Judicial Authorization Yes or No (Circle One) 6b. If Resolution is not attached, when was Mo	ion in Commo	nwealth Court Att	ached?		
7.	twenty-one (21) years? Yes or No (Circle One) 7a. If yes, Please name:			·		
8.	Is Plaintiff deceased? Yes or No (Circle One) 8a. If yes, Is Declaration of Heirship attached? 8b. Please list all heirs:	Yes or No (Ci		- ·		
9.	Settlement amount for compensation of bodily claims: \$		al anguish, pain an	- id suffering and similar		
10	. Settlement amount for compensation of:					
	a. Loss of income: \$ c. Property damage: \$ a. Other Similar Claims: \$	d. Ecor	ness interruption: nomic Support:	\$		
Pa	art B: Attorney's Information					
1.	Federal Case Number:2.	. State Case N	umber:			
1a.	Fed Attorney Name: 22	a. St Attorney	Name:			
1b.	. Federal Bar Number:21	b. State Bar N	umber			

Submit completed form to: Ann Hicks by express mail at The Enron Building, 1400 Smith Street, Room 2106A, Houston, Texas 77002 or by facsimile at 713-853-6576.